

EXHIBIT 2

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

JAMES MILLER, et al.,

Plaintiffs,

vs.

XAVIER BECERRA, in his official capacity as Attorney General of California, et al.,

Defendants.

Case No. 3:19-cv-01537-BEN-JLB

Hon. Roger T. Benitez Magistrate
Hon. Jill L. Burkhardt

**DECLARATION OF ASHLEY
HLEBINSKY IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

Complaint filed: August 15, 2019
Amended Complaint filed:
September 27, 2019

Hearing Date: January 16, 2020
Time: 10:00 a.m.
Courtroom: 5A, 5th Floor

DECLARATION OF ASHLEY HLEBINSKY

2 I, Ashley Hlebinsky, declare as follows:

3 1. I am the Robert W. Woodruff Curator of the Cody Firearms Museum as well as a
4 firearms and ammunition related museum consultant, expert witness, freelance writer,
5 guest lecturer, and founder of the newly formed Association of Firearms History and
6 Museums. I have been retained by the plaintiffs in this matter to provide historical
7 testimony regarding the lineages of several key technologies listed in the California
8 Penal Code 30515 to highlight that many of these features were developed over a
9 century ago and have seen “common use” and are “not dangerous or unusual.” I have
10 personal knowledge of the facts stated herein, and if called as a witness, I could
11 competently testify to these facts.
12

2. This declaration is executed in support of plaintiffs' motion for the issuance of a preliminary injunction, made pursuant to FRCP 65.

QUALIFICATIONS AND EXPERIENCE

3. I am the Robert W. Woodruff Curator of the Cody Firearms Museum at the Buffalo Bill Center of the West. At the museum, I manage an encyclopedic collection of around 7,000 firearms. Prior to my work at the Buffalo Bill Center of the West, I researched in the Smithsonian Institution's National Firearms Collection for about three years. During this time, I studied firearms from the 1200s through modern day. I not only studied the evolution of firearms technology but completed work on the United States Patent Office Collection. I also worked as a liaison between the Smithsonian Institution and the Buffalo Bill Center of the West, helping to facilitate the loan of 64 firearms from the Smithsonian collection to the Center. A large portion of that loan and subsequent loans thereafter centered around the Patent Collection and early evolution of firearms technologies. In addition to my work with the National Firearms

1 Collection, I earned Bachelor's and Master's degrees in American History, with a
2 certification in Museum Studies, focusing my research towards the latter half of my
3 degree on a macro historical approach to studying how advancement of firearms
4 technology affected industry, society, and culture as well as the perception of those
5 firearms within a given culture. During my time in graduate school, I was awarded the
6 Edward Ezell Firearms Fellowship from the University of Delaware, which allowed me
7 to complete my research on the Smithsonian collection. Additionally, I was a teaching
8 assistant in a military history survey course. During this survey, I taught the firearms
9 portion of the class. I am an NRA Certified Firearms Instructor, in Basic Pistol and
10 Personal Protection Inside the Home. I simultaneously earned my Well Armed Woman
11 Instructor Certification. At the museum, I have been responsible for the education of
12 hundreds of students from elementary through college levels, where we teach not only
13 firearms safety and basics, but the historical and technical evolution of the firearm.
14 Additionally, I served as the Project Director on a \$12.9 million full scale renovation
15 and reimagining of the Cody Firearms Museum, which reopened July 6, 2019. I was
16 responsible for all aspects of the renovation from fundraising to content. As a museum
17 consultant, under a single member LLC (The Gun Code), I conduct workshops on
18 firearms collections, survey collections and curate exhibitions at institutions such as the
19 Houston Museum of Natural Science, the Winchester Mystery House, CM Russell
20 Museum & Complex, the Mob Museum, and the Adirondack Experience (November
21 2019.) I am also a freelance firearms writer, guest lecturer, on-camera firearms
22 historian, and firearms related television producer.

23 4. I have also made contributions to the academic study of firearms. In 2017,
24 I developed the first full scale symposium in the United States dedicated to the study of
25 firearms as material culture. That symposium has grown and is carried out annually. In

1 October 2018, I also founded an academic association in the US for the study of
2 firearms (Association of Firearms History and Museums) which is still in its early
3 stages of development. A current copy of my Curriculum Vitae summarizing my
4 education and experience is attached as **Exhibit 1**.

5 **PRIOR EXPERT WITNESS TESTIMONY**

6 5. Because my research covers centuries of firearms and ammunition development,
7 I have a large breadth of topics related to the subject matter on which I can testify.
8 I have served as an expert witness in the following matters:

9 10 *Shannon Wayne Garrison, et al v Sturm, Ruger & Company, Inc.*

11 Report written November 2017

12 Deposition Testimony, Chicago, IL November 27, 2017

13 *Regina v Carvel Clayton*

14 Halifax, Nova Scotia

15 Report written December 2017

16 **SCOPE OF WORK**

17 6. This declaration will provide some historical background on many of the firearms
18 and firearms related technologies outlined in California Penal Code 30515 as attributed
19 to the term “assault weapon.” It should be noted that the term “assault weapon” in and
20 of itself is a legislative term in which the definition changes depending on state and
21 federal legislation and bills proposed. The Cody Firearms Museum typically defines
22 assault weapon as, “a legislative catch-all term used in the 1994 assault weapons ban
23 and since has had differing definitions in proposed legislation typically centered around
24 largely cosmetic features of semi-automatic firearms.” This declaration will look briefly
25 at the origins or early appearances of these technologies throughout history not only for
26 battlefield use but in the civilian sphere. The opinions expressed in this declaration are
27 mine, and are not reflective of any position of the Cody Firearms Museum.

1 7. It is important to note from an overall historical perspective, early firearms
 2 technology was often driven by war. Once that technology was developed, inventors
 3 and designers pushed the boundaries of firearms technology. For example, the first
 4 handheld portable gun, or firearm, was known as a handcannon or handgonne, which
 5 appeared on the battlefield in the 1200s. The ignition system was basic, utilizing a
 6 touchhole and external fire source to ignite powder and fire the gun. While many
 7 examples were single shot, some handcannons were developed with multiple barrels to
 8 have a repeating function. An example of a handcannon, and a multiple barrel version,
 9 are attached hereto as **Exhibit 2**.¹

10 8. Often the technology advanced too quickly and would go beyond common
 11 battlefield use, finding popularity in the civilian population. Military firearms in a
 12 general sense were limited by tactics and government bureaucracy while civilian arms
 13 until recently were predominantly limited by individual budget. Additionally, civilian
 14 arms could be applied in a far greater variety of uses (e.g., hunting, self-defense, sport).
 15 The first true ignition system, the matchlock, was developed around 1400. This firearm,
 16 which utilized a burning match cord, was a popular military arm for centuries around
 17 the world. By the turn of the 16th century, however, matchlocks and subsequent ignition
 18 systems began appearing in early target shooting competitions. (**Exhibit 3**).
 19

20 9. By circa 1509, a highly advanced handgun was developed – the wheel-lock.
 21 (**Exhibit 4**). This gun, developed for horseback use, operated by the turning of a spring
 22 loaded wheel. While it saw battlefield use, it was expensive and difficult to repair. As a
 23 result, it was used for specialized purpose on the battlefield and for civilian use,
 24 especially as a sporting arm. The matchlock continued to be used on the battlefield
 25

26
 27
 28 ¹All further exhibits attached to this declaration are true and correct examples of the

despite this availability of superior technology. While it may seem trivial to discuss the earliest firearms history within the context of a case on “assault weapons,” it is important 1. to identify a precedent set for why, how, and whom firearms technology has evolved over 800 years. Since the beginning of firearm invention, while firearms have been applied for use in war, the civilian market bore the fruits of innovation. As an additional layer of the common interplay between military and civilian firearms, weapons used *in* war were often sold on the civilian market both during and after wars’ end. For example, after the American Civil War, post war weapons surplus firearms became available on the civilian market. Soldiers could buy their firearms for as inexpensive as six dollars and many dealers and distributors sold them in their catalogs. This continued in the 20th century, with firearms such as the Springfield Model 1903 bolt action rifle and even with semi-automatics such as the M1 Garand rifle. There has always been an eb and flow of civilian and military firearms for centuries. And 2. several features listed in Penal Code 30515 date back just about as long as some of these early firearms and firearms technology in some form or another, predating even semi-automatic technology.

**HISTORICAL REVIEW OF FIREARM FEATURES:
CAL. PENAL CODE § 30515(a)**

10. There are many terms used to qualify rifles, pistols, and shotguns regulated in California under this code. A few overarching categorical terms that appear across the type of firearm are the terms: repeater, magazine (fixed or detachable), centerfire, and semi-automatic. Please note the following history is not comprehensive, rather serves to provide a sampling of the early appearances of each individual technology to illustrate

firearm/feature being referenced.

1 their long history of both military *and civilian* use and their commonality.

2 11. To reiterate, the concept of a repeating firearm dates to the earliest technology
 3 of firearms. The idea of repeating firearms was not initially popular on the battlefield
 4 due to cost and convenience, however, repeating firearms in the civilian market were
 5 popular for those who could afford them. Many double barrel firearms were developed
 6 to provide hunters with a second shot, but that repeating concept quickly moved far
 7 beyond the California penal code's definition of "high capacity" at ten rounds. In the
 8 mid-1600s in Italy, the Lorenzoni system of firearm was developed and then imitated by
 9 many designers in long gun and pistol form. (**Exhibit 5**). This gun was a flintlock,
 10 magazine-fed repeater that fired around seven shots before having to reload. A century
 11 later the, Girardoni/Girandoni (1779) air rifle (**Exhibit 6**) could fire about 20 rounds
 12 from a tubular magazine. By the mid-1800s, many firearms both obscure and common
 13 had magazine capacities at ten or greater rounds including the 1854 patented Volcanic
 14 repeating pistols (**Exhibit 7**) (.31 caliber 6in barrel: 10 rounds, .41 caliber 8in barrel:
 15 10 rounds) and carbines (16in barrel: 20 rounds, 20in barrel: 25 rounds, 24in barrel:
 16 30 rounds), the 1860 Henry rifle (**Exhibit 8**) (15+1 rounds), and the 1853 (Belgium) and
 17 1857 (US) patented Genhart Rifles (**Exhibit 9**) (10 rounds), as well as multiple models
 18 of Winchester starting in 1866. By the end of the 19th century, the earliest versions of
 19 semi-automatic pistols such as the Borchardt C-93 contained eight rounds from a
 20 detachable magazine (1893) and the Mauser C-96 had a 10-round magazine (1895).
 21 Even certain Luger semi-automatic pistols in the early 1900s had the option of 32-round
 22 snail drum magazines. (**Exhibit 10**).
 23

24 12. The next major concept is the presence of a magazine, fixed or detachable.
 25 Magazine fed firearms dates to at least the 1600s with the Lorenzoni system.
 26 (**Exhibit 11**). The Girardoni air rifle as previously stated used a tubular magazine in the
 27

1 late 1700s. The tubular magazine was first patented in the US in the 1840s, notably with
 2 the Hunt Volitional Rifle (**Exhibit 12**), the oldest direct ancestor to the Winchester rifle.
 3 Magazines came in many shapes and sizes and became prevalent in the mid-1800s. For
 4 example, the Spencer repeating rifle (**Exhibit 13**) utilized a detachable tubular
 5 magazine from the buttstock. In the 1850s, the Genhart turret rifle (**Exhibit 14**) had a
 6 detachable circular magazine with an externally visible shot/round counter. Between
 7 1859 and 1862, the Jarre Harmonica Pistol and Rifle received several patents. This gun
 8 has a horizontally seated magazine that slides after each round is fired like a typewriter.
 9 It is also detachable. (**Exhibit 15**).

10 13. In terms of box magazines, early ones were patented by designers including
 11 Rollin White in 1855. A detachable version was patented in 1864 by Robert Wilson.
 12 (**Exhibit 16**). A vertically stacked box magazine was patented by James Paris Lee in
 13 1879 which was applied to several rifles including the Mannlicher semi-automatic
 14 Model 1886. (**Exhibit 17**). In terms of other semi-automatics, the Mauser C-96 pistol
 15 had a fixed magazine and the Borchardt C-93 had a detachable one. Several
 16 semi-automatic models of Winchester utilized magazines, including the Winchester
 17 Model 1907, a centerfire rifle with various sizes of box magazine (5 and 10) and some
 18 Winchester Model 1903s had a lesser known Sabo 96-round detachable tubular
 19 magazine. (**Exhibit 18**).

20 14. The next major feature of this penal code is the term, centerfire. This term
 21 refers specifically to the type of ammunition the gun fires. Centerfire refers to the
 22 location of the priming compound. Self-contained cartridges typically consist of a case,
 23 primer, powder, and projectile. Centerfire has a separate primer in the center of the head
 24 of the cartridge case. This is to distinguish it from rimfire, which has an integral primer
 25 in the rim of the cartridge case. (**Exhibit 19**). Traditionally, people are most aware of
 26

1 .22 caliber rimfires but there have been many larger calibers including the .44 Flat
 2 Henry Rimfire cartridge. Centerfire cartridges started in the early 1800s. In 1808, Jean
 3 Samuel Pauly invented an early form of centerfire cartridge and the true centerfire was
 4 developed in 1829 by French inventor Clement Pottet and perfected by the 1850s.

5 15. Finally, the term that this Penal Code addresses most of all is semi-automatic.
 6 Semi-automatic operation involves pressing a trigger to fire one round, eject a spent
 7 case, and load another to be fired on the next trigger pull. (**Exhibit 20**). Today, a
 8 majority of firearms are semi-automatic rifles, pistols, or shotguns. Semi-automatic
 9 technology was developed in the 1880s around the same time as automatic technology.
 10 The Mannlicher rifle is generally attributed to be the first semi-automatic rifle
 11 (**Exhibit 21**); handguns followed shortly after. The first mass produced semi-automatic
 12 pistol was the Hugo Borchardt designed C-93 with detachable 8-round magazine. The
 13 Mauser C-96 followed, as did the John Moses Browning's Model 1899/1900 pistol.
 14 Often in the marketing of these pistols in the late 19th and 20th centuries, the companies
 15 would refer to them as "Automatic" pistols. However, please note they are still
 16 semi-automatic in function. According to the definitions of the Gun Control Act of
 17 1968, such firearms made before 1898 are not federally regulated firearms, they are
 18 antiques. By that definition and regulation, some semi-automatic pistols and rifles are so
 19 old, they are not legally firearms according to the federal government. In the 20th
 20 century, semi-automatic firearms used in conjunction with a variety of the features
 21 listed above have been and continue to be made into thousands of models by countless
 22 companies. They are commonly used in the civilian market as well as the military,
 23 incorporating many other features addressed in the Penal Code.
 24

25 16. The following is a list of additional features addressed in Penal Code § 30515:
 26

27 17. **Pistol Grip:** Pistol grips appear on long arms dating to at least the 1700s.

1 (Exhibit 22). Single shot flintlock and later percussion pistols sometimes would have
 2 the feature of a detachable stock. When assembled these long guns would use the grip
 3 from the pistol as a maneuverable device. This trend continued with repeating arms,
 4 including several models of Colt revolvers, in the civilian and military market. The
 5 Borchardt semi-automatic pistol of 1893 and the Mauser C96 also had a detachable
 6 stock option. If a user didn't have one of these models, universal holsters to convert a
 7 pistol to a rifle with a detachable stock existed. (Exhibit 23). On firearms without
 8 detachable stocks, pistol grips appear on all variances of firearms actions. Machine
 9 guns, including the Colt Model 1895, French Chauchat (1907) and several Maxim
 10 models had pistol grips. Submachine guns like the Thompson (1918) had them as well.
 11 Pistol Grips not only appear in machine guns but also other guns, such as shotguns –the
 12 Ithaca Auto & Burglar (1922), the Harrington & Richardson Handi Gun (1921), and the
 13 Marble Game Getter (1908) – as well as semi-automatic firearms including the
 14 M1A1Paratrooper Carbine designed with not only a pistol grip but folding stock.
 15 (Exhibit 24).

16 18. **Forward Grips:** One of the earliest forward pistol grips is found on the French
 17 Magot rifle from the 1860s. Possibly one of the only copies of this gun is in the Cody
 18 Firearms Museum as it was purchased by Winchester during their lawsuit with the
 19 company Bannerman. (Exhibit 25).

20 19. **Thumhhole Stocks:** While a traditional thumbhole stock is difficult to
 21 historically trace, their regulation has a deep impact on sporting and Olympic firearms
 22 in the modern era. The concept of a stabilizing entity to help with maneuverability and
 23 accuracy dates to the earliest civilian sporting arms firearms. For example,
 24 Schuetzenfest, dating from the 1600s through today, had elaborate sporting rifles
 25 created with molded cheek pieces and places for the hand including palm rests - while
 26
 27
 28

1 not technically a thumbhole, these provided the same stability for which a thumbhole is
 2 used. German Frei pistol of the 19th and 20th centuries, used handguns that were made
 3 specifically as a stabilizing placement custom for the individual athlete. (**Exhibit 26**).
 4 Certain Olympic rifles feature thumbhole stocks, including several models of
 5 Winchester, dating to the 1950s. This type of concept or technology is a very prominent
 6 shooting sports feature. (**Exhibit 27**).
 7

8 **Folding or Telescoping Stock:** The Cody Firearms Museum has a
 9 folding stock snaphaunce blunderbuss that dates to around 1650-1700.
 10 (**Exhibit 28**). With early firearms, folding or adjustable stocks are not necessarily
 11 seen because pieces in the civilian world were made by artisans prior to mass
 12 production. However, the appearance of detachable stocks – converting a pistol to
 13 a rifle/carbine – appear in the 1700s on flintlocks and continue to be incorporated
 14 on percussion, revolver, and semi-automatic guns. The Luger Model 1902
 15 semi-automatic carbine has an added stock to convert the pistol to a carbine.
 16 (**Exhibit 29**). As guns begin to be mass produced on scale, various models are
 17 often made, such as a Junior or Ladies rifle that provide a different size option for
 18 the sport shooter. The flexibility of stock size is very strong in the civilian market
 19 where comfort and having firearms suited for the individual are preferable and
 20 feasible. In the early 1900s, and possibly earlier, Try Guns were carried by
 21 salesmen to allow the consumer to adjust the stock to fit them to see what size this
 22 person needed. Two examples in the Cody Firearms Museum collection are the
 23 Winchester Model 12 and LC Smith Try Guns. (**Exhibit 30**). This lays the
 24 foundation for a consumer market interested in customizing and adjusting their
 25 stocks to fit them appropriately. Folding stocks do make appearances in the
 26 military sphere with the M1A1 Paratrooper Carbine model as well as several
 27 submachine guns. (**Exhibit 31**).
 28

21. **Grenade Launcher or Flare Launcher:** Grenade launchers, also known as

1 hand mortars, date to the 1600 and 1700s. Flare guns were in use by the 1800s.

2 22. **30 Inches or Less:** The idea behind a shorter rifle is known as a carbine. While
 3 the definition can vary, it typically refers to a barrel less than 20 inches. Additionally,
 4 many pistols with detachable stocks fall under this category. By adding a stock to a
 5 C-93, C-96 or Luger it converts a semi-automatic pistol into a semi-automatic rifle.
 6

7 23. **Flash Suppressor:** Flash suppressors appear on machine guns from World War
 8 I and earlier including the Chauchat and Maxim but technically, any gun affixed with a
 9 Silencer, invented in 1902, could be considered to have a flash suppressor. Silencers
 10 were heavily marketed to the civilian population as target accessories, so this would
 11 have been available for numerous firearms models. The traditional flash hider on
 12 military arms, not classified as a machine gun, were used during WWII on guns such as
 13 the Lee-Enfield “jungle carbine” and have appeared on AR platform firearms, invented
 14 in the 1950s. (**Exhibit 32**).

15 24. **Threaded Barrel:** An early idea of a quick attachment system in or on a barrel
 16 of a gun is the bayonet. Developed in the 16th century, the bayonet was commonly used
 17 for both military and civilian firearms. There have been a variety of muzzle devices that
 18 have attached to a barrel since (compensators, silencers, muzzle brakes, flash hiders
 19 etc). While some early semi-automatic rifles, pistols, and shotguns had threaded barrels,
 20 the military did not always use threaded barrels for their suppressed firearms, nor did
 21 the civilian market. This is because Hiram Percy Maxim, the inventor of the Silencer,
 22 sold his silencer often with an adapter that allowed a silencer to be affixed without a
 23 threaded barrel, making the need for a threaded barrel or the thought that no threaded
 24 barrel would prevent a silencer moot.
 25

26 25. **Barrel Shroud:** According to the penal code, the concern for a barrel shroud is
 27 that it would prevent “burning the bearer’s hand.” While typically not thought about, by
 28

1 that definition, any firearm with a full length stock fits the definition, like a Brown Bess
 2 or early single shot pistols. (**Exhibit 33**). To speak in more modern terms, target
 3 shooting pistols also tend to have a partial barrel shroud on examples such as the
 4 Remington XP100 from the 1960s and the Browning Buckmark Silhouette.
 5 (**Exhibit 34**).
 6

7 **26. Detachable Magazine:** Although already stated, the detachable magazine was
 8 already in use by the 1890s on semi-automatics. Many earlier firearms in the 1800s
 9 such as the Spencer, Genhart, Jarre, and Lee Metford also had detachable magazines.
 10 These firearms were popular and common both on the military but also the commercial
 11 market. For example, the standard infantry arm of the American Civil War was a single
 12 shot muzzleloading musket. The repeaters that were readily available at the same time
 13 were not openly embraced by military and therefore were a popular consumer product.
 14 In fact, the trend of the commercial market being decades ahead in innovation than the
 15 military adopted firearms is a trend that has continued into the modern era.
 16

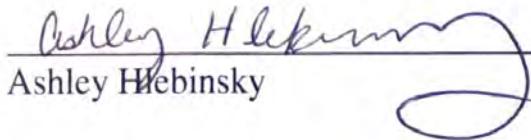
17 **27. Shotgun with a Revolving Cylinder:** The earliest revolving firearms had
 18 shotgun models. For example, the Collier (1814), a flintlock and later percussion
 19 revolver in which the user had to manually rotate the cylinder, had shotgun models.
 20 Samuel Colt, the creator of the modern revolver, sold revolving shotguns as early as
 21 1839, just four years after his first US patent. (**Exhibit 35**).
 22

CONCLUSION

23 28. To reiterate, this examination of the firearms features of the California Penal
 24 Code 30515 is not comprehensive but is meant to serve as a springboard of
 25 understanding that these technologies, in most respects, have been used for centuries far
 26 before the invention of Armalite's AR-15 in the 1950s or the Kalashnikov AK-47. By
 27 the 20th century, semi-automatic firearms with various combinations of features such as
 28

1 pistol grips, flash hiders, folding/telescoping stocks, and detachable magazines had been
2 modified and perfected to the point of replication in hundreds, possibly thousands, of
3 models by countless manufacturers for both civilian and military markets. If called to
4 testify, my report would go beyond the origins into the proliferation of these features on
5 a modern consumer market of the 20th and 21st centuries. However, with the
6 determination that these features were conceptualized and in use prior to the 1950s, it is
7 fair to say that really one of the only major new features incorporated to the AR-15
8 were lightweight alloys to synthetic materials that became a popular experimentation
9 across all firearms platforms after World War II as history provides many examples of
10 these features being used in conjunction with semi-automatic firearms in a number of
11 configurations for nearly a century.

13 I declare under penalty of perjury that the foregoing is true and correct. Executed on
14 December 16, 2019.

15 
16 Ashley Hlebinsky
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EXHIBIT "1"

Exhibit 1: Ashley Hlebinsky Curriculum Vitae

Ashley Hlebinsky

2313 Central Avenue Unit A

Cody, WY, 82414

Email: theguncode@gmail.com

Phone: 412-491-2493

Education:

Master of Arts, American History, University of Delaware, 2013

Bachelor of Arts, American History, University of Delaware, 2011

- President: Phi Alpha Theta History Honor's Society, 2010-2011

Recent Honors/Awards:

Wyoming Business Report's Top 40 Under 40, 2017

National Shooting Sports Foundation & Professional Outdoor Media Association's Grits

Gresham Shooting Sports Communicator of the Year Award, 2017

Nominee – Wyoming's Non-Profit Woman of Influence, 2017

Grants:

National Endowment for the Humanities, 2017

Institute of Museum and Library Services, 2017

Gretchen Swanson Family Foundation, 2015, 2016, 2017, 2018, 2019

Kinnucan Arms Chair Grant, 2012

Fellowships:

Firearms Curatorial Resident, Buffalo Bill Center of the West, 2013

Edward Ezell Fellowship, University of Delaware, 2012

Buffalo Bill Resident Fellowship, Buffalo Bill Center of the West, 2011

Committees and Memberships:

Founding President – Association of Firearms History and Museums

- First academic association for the study of firearms history in United States

Founder – Arsenals of History Symposia Series

- First international symposia series on the academic study of firearms

Spokesperson – NSSF/AFSP Suicide Prevention and Project ChildSafe Programs

National Rifle Association’s Gun Collecting Committee

American Alliance of Museums – Member

American Society of Arms Collectors – Member

Winchester Arms Collectors Association – Honorary

Remington Society of Arms Collectors – Member

Weatherby Collector’s Association –Life Member

Selected Firearms-Related Professional Experience:

Consultant. Adirondack Experience. November 2019

Project Director, Cody Firearms Museum Renovation, Buffalo Bill Center of the West, Cody, WY, 2015-2019

Consultant. Winchester Mystery House, August 2019.

Consulting Scholar. National Park Service & Organization of American Historians, March 2019.

Robert W. Woodruff Curator, Cody Firearms Museum, Buffalo Bill Center of the West, Cody, WY, 2015-Present

Consulting Curator, Houston Museum of Natural Sciences, 2018 - Present

Producer. *Gun Stories with Joe Mantegna*, Outdoor Channel. 2017-Present

Consulting Producer. *Brothers in Arms*, History Channel. 2017

Consultant/Curator. Daniel Defense, Black Creek, Georgia. 2017

Consultant, National Museum of Law Enforcement and Organized Crime (Mob Museum), Las Vegas, NV, 2016

Associate & Acting Curator, Cody Firearms Museum, Buffalo Bill Center of the West, Cody, WY, 2015

Guest Curator. C.M. Russell Museums and Complex, 2015-2016

Guest Curator. Cody Firearms Experience, 2015

Assistant Curator, Cody Firearms Museum, Buffalo Bill Center of the West, Cody, WY, 2013-2014

Teaching Assistant, The Jewish Holocaust: 1933-1945, University of Delaware, 2013

Teaching Assistant, Introduction to Military History, University of Delaware, 2012

Teaching Assistant, History Education, University of Delaware, 2011

Researcher/Fellow, National Museum of American History, Smithsonian Institution, 2010-2013

Archival Assistant, University of Delaware Special Collection, 2010-2011

Firearm Intern, Soldiers and Sailors National Memorial Hall, 2008

Publicly Disclosed Expert Witness Testimony:

Regina (Nova Scotia) vs Clayton, January 2019

Garrison vs Sturm, Ruger & Company, Inc. 2018

Selected Media Appearances:

Co-Host. *Master of Arms*. Discovery Channel, 2018.

On Camera Expert. Gun Stories with Joe Mantegna, Outdoor Channel, 2015 - Present

Re-Occurring Expert. Mysteries at the Museum, Travel Channel, 2016-Present

Re-Occurring Guest. Sportsmen of Colorado, Radio The Source 560 AM KLZ, 2014 - Present

Guest. To the Best of Our Knowledge, National Public Radio, 2016

On Camera Expert. American Genius, National Geographic, 2015

Guest Host. Gunrunner Radio. Big Horn Radio, 2014

Also appears on: National Public Radio, Fox News, Media, Entertainment, Arts, WorldWide, Women's Outdoor News, Outdoor Life, Shooting USA, NRA News, Gun Talk Media, National Shooting Sports Foundation, Discovery Channel, Travel Channel, National Geographic

Has been profiled by: The Bourbon Review, Recoil Magazine, Outdoor Life Magazine, Guns.com, Blue Press Magazine, and many other national news outlets.

Selected Lectures/Panels:

Panelist. Firearms and Museums in the 21st Century. National Council for Public History. March 2019.

Scholars Roundtable. Coltnville National Historic Site. Organization of American Historians & National Park Service, March 2019.

Forum Speaker. The Art of the Hunt: Embellished Sporting Arms in America. New Orleans Antique Forum, August 2018

Guest Lecturer. Unloading the Gun: Firearms, History, and Museums. Yakima Valley Museum, June 2018

Guest Lecturer. Perpetrators and Protectors: The Mob, The Law and Firearms, National Museum of Law Enforcement and Organized Crime (Mob Museum), September 2017

Organizer. Arsenals of History: Firearms and Museums in the 21st Century, Buffalo Bill Center of the West, July 2017

Lecturer. The Cody Firearms Museum, Arsenals of History Symposium, Buffalo Bill Center of the West, July 2017

Moderator. Addressing the Press: Firearms and the Media, Arsenals of History Symposium, Buffalo Bill Center of the West, July 2017

Moderator. Forming an Association: Legitimizing Firearms in Academic Study, Arsenals of History Symposium, Buffalo Bill Center of the West, July 2017

Guest Lecturer. Displaying the “Politically Incorrect,” C.M. Russell Museums and Complex, May 2017

Guest Lecturer. Displaying the “Politically Incorrect,” Blackhawk Museum, March 2017

Panelist. Curator Roundtable, Firearms and Common Law Symposium, Aspen Institute, September 2016

Guest Lecturer. Displaying the “Politically Incorrect,” Canadian Guild of Antique Arms Historians, April 2016

Guest Lecturer. The Cody Firearms Museum Renovation, American Society of Arms Collectors, September 2016

Guest Lecturer. From Protector to Perpetrator: Demystifying Firearms in History, Art Institute of Chicago, November 2015

Guest Lecturer. Winchester '73: The Illusion of Movie Making, Winchester Arms Collectors Association, July 2014

Guest Lecturer. Unloading the Six Shooter: Disassembling the Glamorization and Demonization of Firearms in the Arts, Buffalo Bill Center of the West, 2011

Selected Firearms Exhibitions:

Curator/Project Director. *Cody Firearms Museum Renovation*. Buffalo Bill Center of the West. Upcoming July 6, 2019

Co-Curator. *The Art of the Hunt: Embellished Sporting Arms from 1500-1800*. Houston Museum of Natural Sciences. March 2019

Curator. *Glock Makes History: The Birth of the Polymer Handgun Market*. Buffalo Bill Center of the West. June 2016

Guest Curator. *Designing the American West: The Artist and the Inventor*. C.M. Russell Museum & Complex. February 2016

Curator. *The Greatest Gun Designer in History: John Moses Browning*. Buffalo Bill Center of the West. December 2015

Curator. *Journeying West: Distinctive Firearms from the Smithsonian Institution*. Buffalo Bill Center of the West. December 2015

Curator. *The Forgotten Winchester: Great Basin National Park*. Buffalo Bill Center of the West. June 2015

Curator. Western Firearms Gallery, including *Shoot for the Stars: The Tradition of Cowboy Action Shooting*. Buffalo Bill Center of the West. April 2015.

Curator. *Steel Sculptures: Engraving Individuality from Mass Production*. Buffalo Bill Center of the West. Winter 2014.

Certifications:

NRA Certified Firearms Instructor, Basic Pistol, 2016

NRA Certified Firearms Instructor, Personal Protection Inside the Home, 2016

Well Armed Woman Instructor Certification, 2016

Museum Studies Certification, University of Delaware, 2013

Publication History

Books:

Co-Author. *Fifty Featured Firearms at the Buffalo Bill Center of the West*. Mowbray

Publication: Rhode Island, 2017 (in process)

Contributor. *Buffalo Bill Center of the West*. Buffalo Bill Center of the West: Cody, WY, 2016.

Articles:

Author. "Burton Light Machine Rifle." *Recoil Magazine*. October, 2019

Founder/Editor/Author. Arsenals of History Journal, Annual Publication, 2018 - Present

Author. "It's Complicated: The Short Answer to Firearms, Museums and History. *Journal of the Early Republic – The Panorama*, September 2018.

Contributor. "Firearms Curator Roundtable" *Technology & Culture Journal*, August 2018

Author. "Displaying the 'Politically Incorrect.'" *CLOG X Guns*: Chicago, IL, September 2017

Author. "Does History Repeat Itself? The Smith & Wesson LadySmith." *CLOG X Guns*: Chicago, IL, September 2017

Author. "Renovating the Cody Firearms Museum." *International Committee of Museums and*

Collections of Arms and Military History Magazine. Issue 17, May 2017. Pg. 38 - 41

Author. "Renovating the Cody Firearms Museum." *American Society of Arms Collectors Journal.* Fall 2016.

Author. "Glock Exhibit Opening." *Glock Magazine.* Bang Media. Annual 2017

Author. "The 28 Most Notable Guns from Remington's 200-Year History." *Outdoor Life Magazine.* Bonnier Corporation, 2016

Author. "Cassie Waters: Businesswoman of the Old West." *Guns of the Old West.* Harris Publications, Spring 2016

Author. "Making History: GLOCK Pistols at the Cody Firearms Museum" *Glock Magazine.* Harris Publications. Annual 2016

Author. "Pocket Pistols: 10 Seminal Guns from the Past 300 Years." *Pocket Pistols.* Harris Publications. 2016

Author. "The Gun that Won the Western and the Unforeseen Stars of *Winchester '73*" *Guns of the Old West.* Harris Publications.

Author. "Frontier Profile: Jedediah Strong Smith" *American Frontiersman.* Harris Publications

Author. "Frontier Legend John Johnston." *American Frontiersman.* Harris Publications

Author. "The Guns of John Johnston." *American Frontiersman.* Harris Publications

Author. "Annie Oakley VS Lillian Smith: A Female Sharpshooter Rivalry." *Guns of the Old West.* Harris Publications, Spring 2015

Author. "Icons and Has-beens." *American Handgunner.* FMG Publications, 2014

Author. "Triggering Memory: American Identity in *Cowboys and Aliens.*" *Points West.* Spring 2012

Author. "Unloading the Six-Shooter: Disassembling the Glamorization and Demonization of Firearms in the Arts." *Points West,* Fall 2011.

Columns:

Author/Brand Ambassador. *The Bourbon Review.*

Author. *American Association for State and Local History.* Summer 2019

Author. "Weird West: Fact or Fiction" *Guns of the Old West*. Athlon Outdoors (formerly Harris Publications)

1st Assault Rifle

Colt VS Winchester Revolver

Did Winchester Really Win the West?

Oliver Winchester's Lever Action Shotgun

Remington Cane Gun

Author. "Cowboy Action Round Up." SHOT Show New Products. *Guns of the Old West*. Athlon Outdoors (formerly Harris Publications). 2015, 2016, 2017

Reviews:

Reviewer: Edited by Jonathan Obert, Andrew Poe, and Austin Sarat. Oxford: Oxford University Press, 2018. *Journal of Technology & Culture*, Fall 2019

Author. "Everybody Loves an Outlaw: Taylor's Outlaw Legacy Revolver Series." *Guns of the Old West*. Harris Publications

Reviewer: Richard Rattenbury. *A Legacy in Arms: American Firearms Manufacture, Design and Artistry, 1800-1900*. *Chronicle of Oklahoma*, Spring 2016

Selected Blogs & Vlogs:

Recoil Magazine

Weekly video series beginning October 2017 to Present

Dillon Precision

Historical Videos on Ammunition (Upcoming)

Outdoor Life

Top 10 Guns in American History

Guns of the Old West: 10 Iconic Firearms and the Legendary Men (and Women) Who Shot Them

13 of the Biggest Gun Fails in Recent Firearms History

Gun of the Week:

John Martz Luger
Apache Revolver
German Frei Pistol
King Louis XV Embellished Blunderbuss
Armalite AR-17 Shotgun
Getting the Christmas Goose with a Goose Rifle & Cutaway Suppressor
Mossberg Brownie
Wesson & Leavitt Belt Revolver
William Harnett and the Faithful Colt 1890
Winchester Model 1894 Lever Action Rifle
Ruger Semi-Automatic Pistol, 1 of 5,000
Herb Parson's Winchester Model 71 Lever Action Rifle
Lincoln Head Hammer Gun
American Trap Gun
Browning Brother's Single Shot Rifle Patent
Feltman Pneumatic Machine Gun
U.S. Springfield-Allin Conversion Model 1866 Trapdoor Rifle
Winchester Wetmore-Wood Revolver
Webley-Fosbery Automatic Revolver
Hopkins & Allen XL3 Double Action Revolver
DuBiel Modern Classic Rifle
Colt Model 1877 "Thunderer" Double Action Revolver
Tom Tobin's Colt Model 1878 Frontier Revolver
Walch 10-Shot Double Hammers Pocket Revolver
Winchester Model 1887, Serial No. 1
Deringer vs Derringer
The Forgotten Winchester 1873 of Great Basin National Park

Range 365

To the One Who Got Away

Gun Review: New Glock 19 Gen 5

Ain't She a Pistol? 10 Historic Gun Ads Featuring Women

National Shooting Sports Foundation

The Gun Vault:

Winchester 1873 Found in Great Basin National Park

Col. Jeff Cooper's Colt MK IV Series 80

500+ Year Old Firearms, Matchlocks, Flintlocks

U.S. Presidents Guns

Cross Dominance Shotgun

Herb Parson's Winchester Model 71 Rifle

Audie Murphy's Colt Bisley Revolver

4 Gauge Winchester Wildfowler

Pocket Pistols

Henry Ford's Winchester Model 1887 Lever Action Shotgun

Tom Knapp's First Gun

Buffalo Bill Cody's Winchester 1873

Colt Model 1861 Navy Serial No. 1

Cassie Waters' Hopkins & Allen XL3 Revolver

Glock 17

The Truth About Guns

Presidential Presentation Rifles

Factory Cut-Away M16A1

1854 Smith & Wesson Repeating Rifle (Serial Number 8)

Winchester World's Fair Model 1866 Deluxe Sporting Rifle

Raymond Wielgus Collection

Gastinne-Renette Muzzleloading Percussion Target Pistols
Oliver Winchester's Jennings Repeater
Henry Ford's Winchester Model 1887
Winchester Model 1866 Musket in .44 Rimfire
English Wheellock
Southern Belle American Longrifle
Annie Oakley's Model 1892 Smoothbore Rifle
Catherine the Great of Russia's Blunderbuss Gift to King Louis XV of France
Color Case-Hardened GLOCK 43: Merging the Old West with the New
Buffalo Bill Center of the West – Unloading the Myth
The Cody Firearms Museum – Yesterday, Today, and Tomorrow
Guns of the Week – Christmas List
Guns of the Week: December 15-19
Guns of the Week – The Cody Firearms Museum
Guns of the Week – German Firearms
Guns of the Week – Scheutzenfest
Guns of the Week – Air Guns
Guns of the Week – Early Firearms Law
Guns of the Week – October 13-17
Guns of the Week – Ingenious Engineering
Guns of the Week – Remington – Smoot
Guns of the Week – September 22-26
Guns of the Week – September 15-19
Guns of the Week – September 8 -12
CSI: Firearms Museum Edition
Confessions of a Gun Historian
Art Guns: Aesthetics Over Function?

What Good's a Gun Without a Firing Pin?

Gun Installations, Trials & Tribulations

A True Test of Marital Trust and Love

Remembering Tom Knapp

Cody Firearms Museum Goes Hollywood

When Will My Firearms Go On Display

What's Your Cody Firearms Museum

To Vlog or Not to Vlog

We Don't Just Have Old Guns in Our Museum: SHOT Show 2014

Taking a Stab at Displaying More Guns

“Hi Yo Silver” Cook Away! Lone Ranger Display

The Shooting Wire

Winchester's 150th Anniversary Website

Remington's 200th Anniversary Website

EXHIBIT "2"



Exhibit 2
0015

EXHIBIT "3"



(obverse)

132

A GERMAN PARCEL-GILT SILVER TARGET SHOOTING PRIZE

DRESDEN, DATED 1537, UNMARKED

Formed as a large shaped circular pendant medallion suspending two smaller openwork medallions, the moulded border with applied foliage and inner laurel wreath centering on a cherub's mask with suspension ring above, the centre repoussé and chased with a huntsman with raised matchlock rifle amongst scrolling flowers and foliage, standing beside an escutcheon of arms of Dresden held by a putto, the backplate engraved with inscription within scrolling foliage incorporating two figures supporting a target above and a standing putto below, the smaller pendant shields each formed as a foliage and berried wreath enclosing an escutcheon, engraved with instruments emblematic of the building trade, one further engraved with initials BK, coat-of-arms and date 1541, the reverse with inscription and date 1540, the other with initials HR, coat-of-arms and date 1563, the reverse with date 1562, within engraved wreath

EXHIBIT "4"



Exhibit 4
0019

EXHIBIT "5"



Exhibit 5

0021

EXHIBIT "6"



**Exhibit 6
0023**

EXHIBIT "7"



Exhibit 7
0025

EXHIBIT "8"



**Exhibit 8
0027**

EXHIBIT "9"



**Exhibit 9
0029**

EXHIBIT "10"



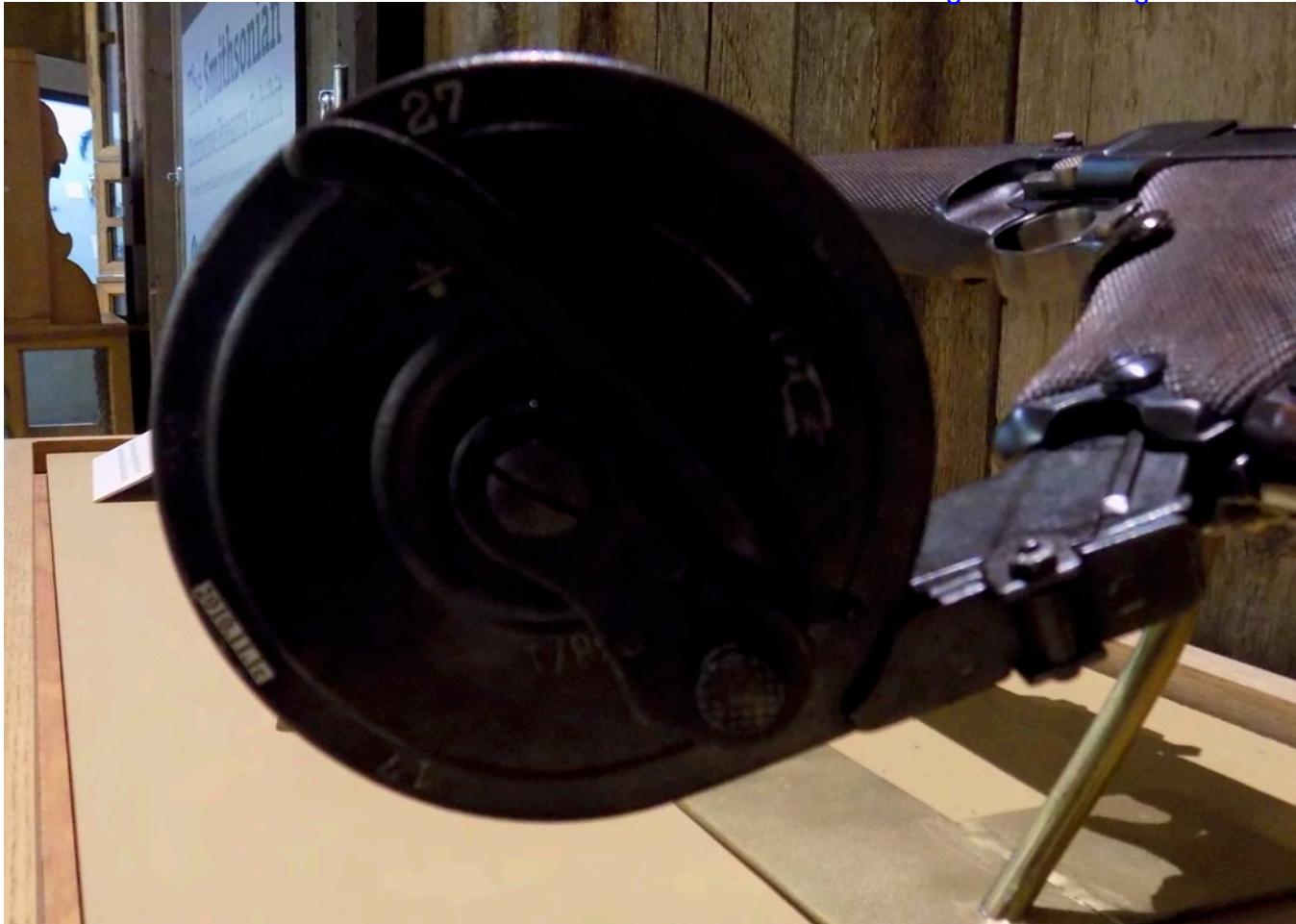


Exhibit 10
0032

EXHIBIT "11"



Exhibit 11
0034

EXHIBIT "12"



Exhibit 12
0036

EXHIBIT "13"



Exhibit 13
0038

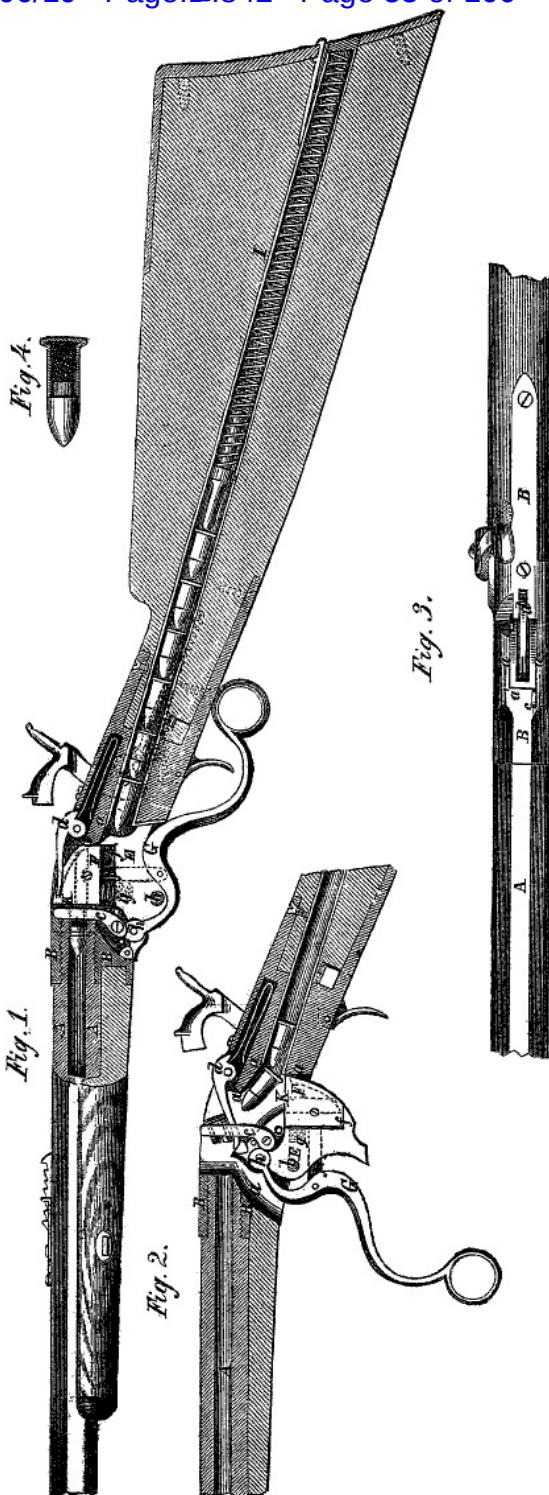


EXHIBIT "14"



Exhibit 14
0040

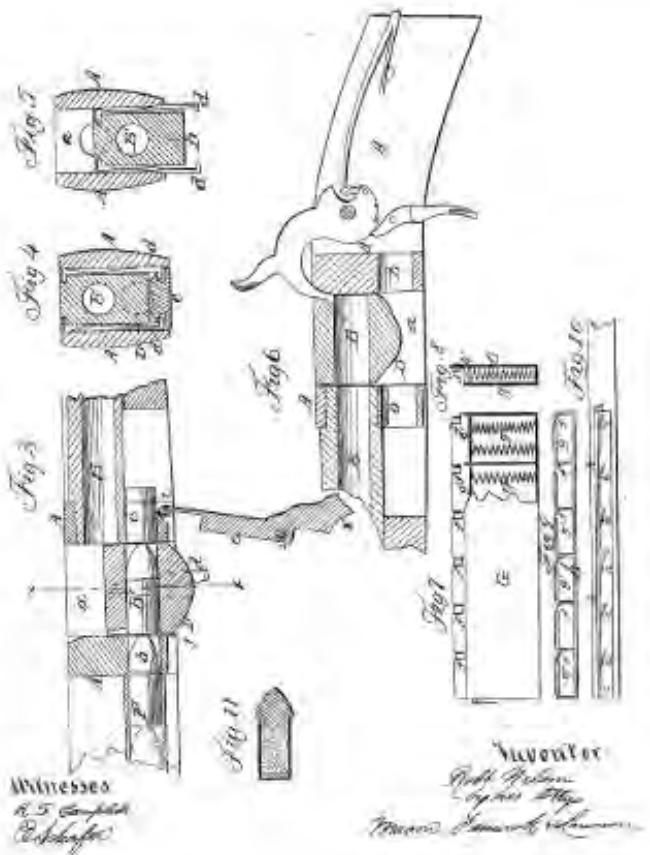
EXHIBIT "15"



**Exhibit 15
0042**

EXHIBIT "16"

H. WILSON.
2 Sheets—Sheet 2
Magazine Fire-Arm.
No. 46,106.
Patented Nov. 15, 1864.



R. WHITE.
REPEATING FIREARM.
No. 12,648.
Patented Apr. 3, 1855.

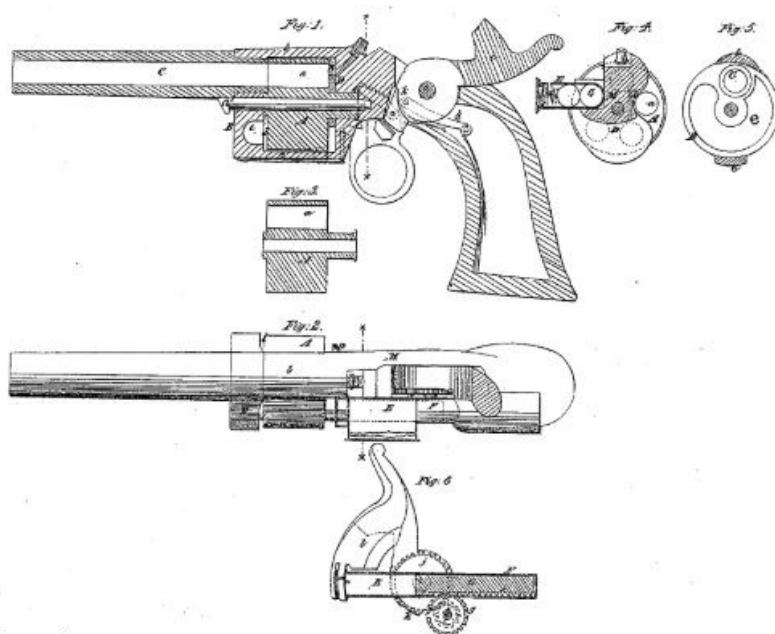


EXHIBIT "17"

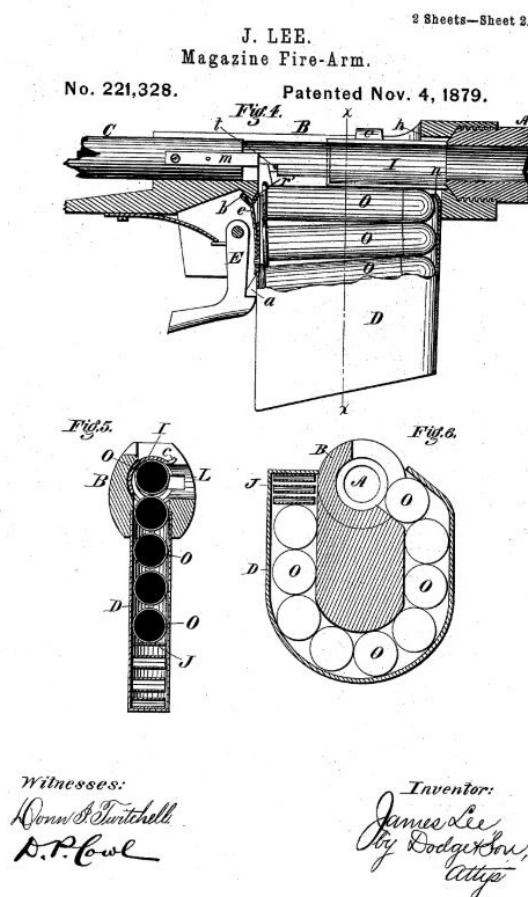
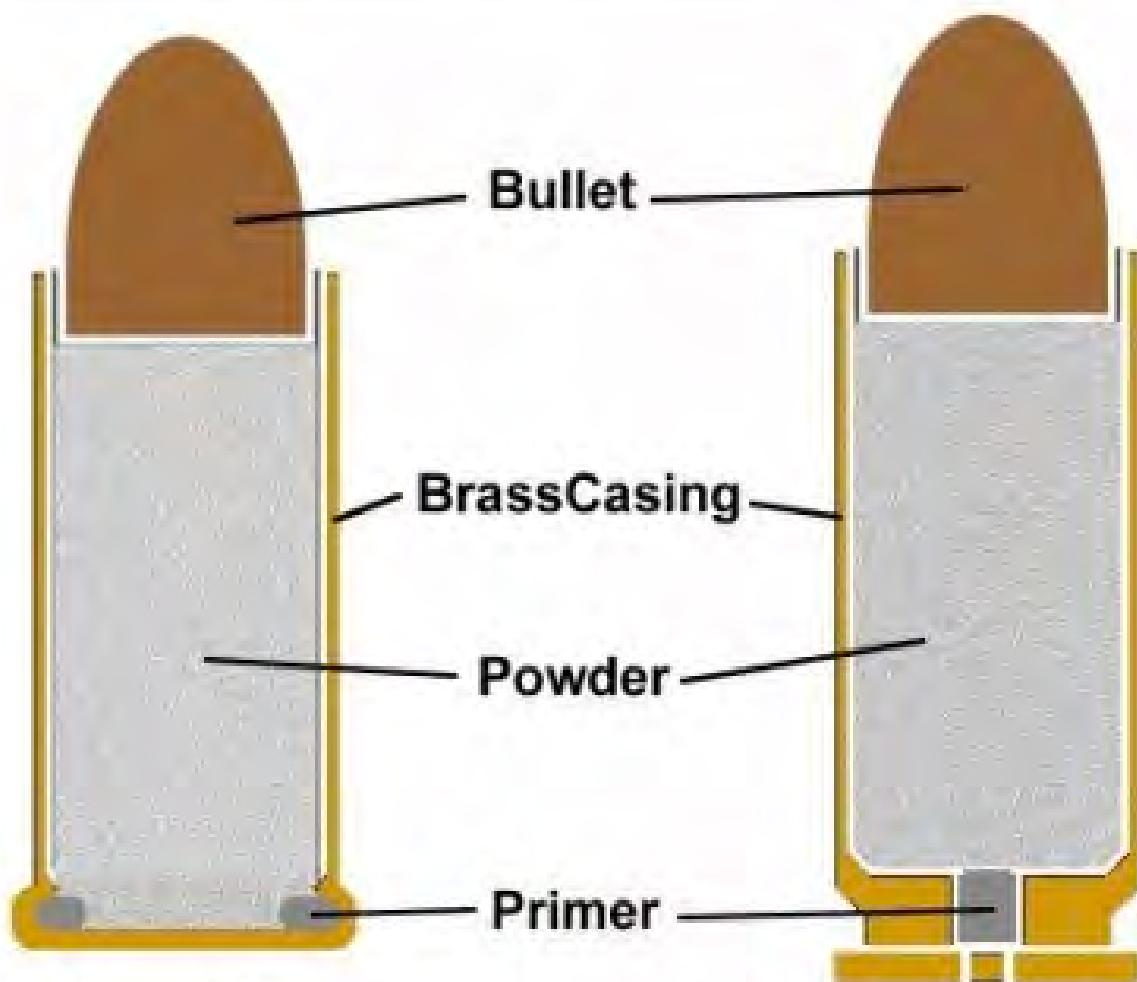


EXHIBIT "18"



Exhibit 18
0048

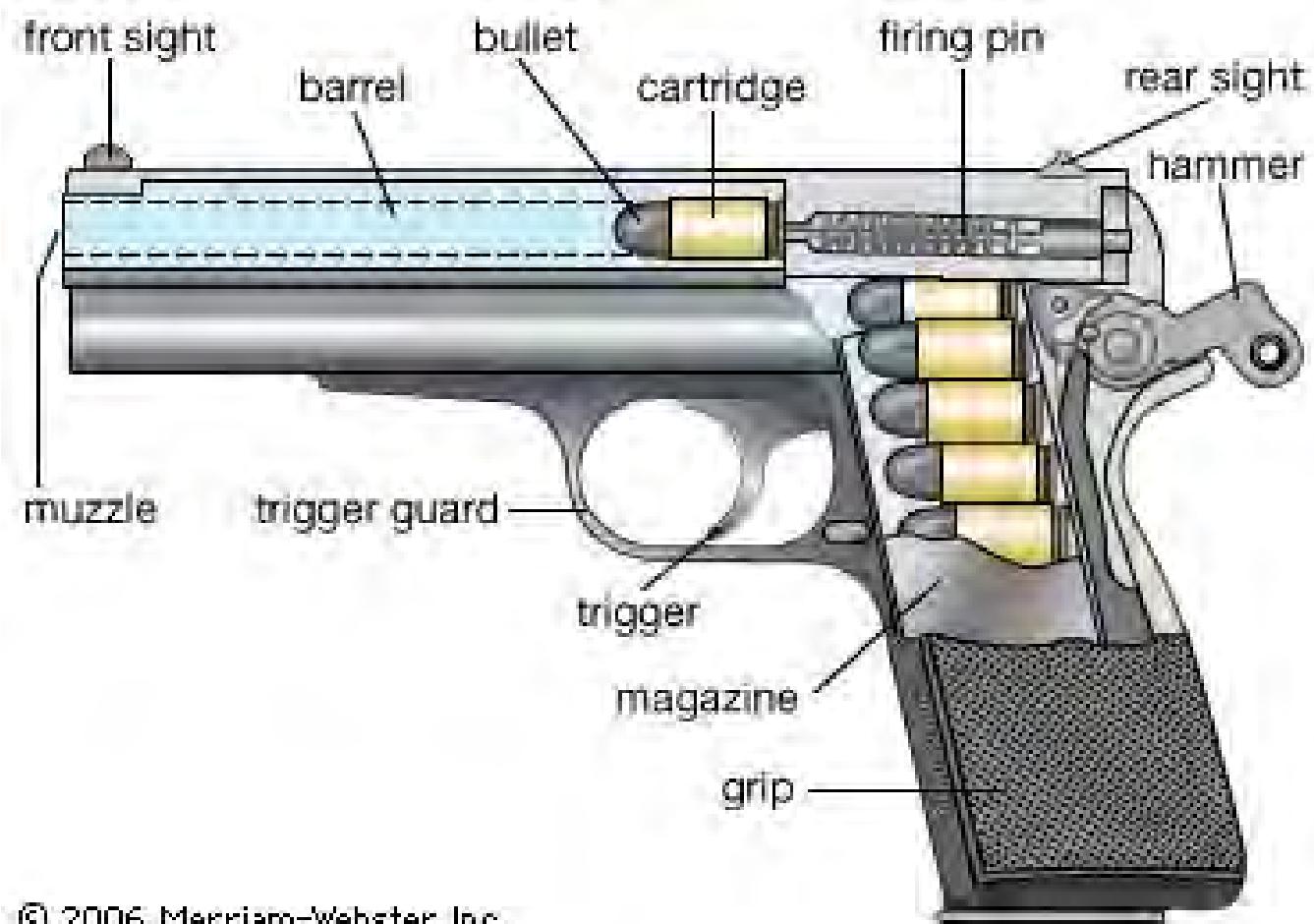
EXHIBIT "19"



Rimfire
Firing Pin
crushes rim

Centerfire
Firing Pin
strikes center
of primer

EXHIBIT "20"



© 2006 Merriam-Webster, Inc.

Exhibit 20

0052

EXHIBIT "21"



**Exhibit 21
0054**

EXHIBIT "22"



**Exhibit 22
0056**

EXHIBIT "23"



**Exhibit 23
0058**



Exhibit 23
0059

EXHIBIT "24"



Exhibit 24
0061

EXHIBIT "25"



Exhibit 25

0063

EXHIBIT "26"



Exhibit 26
0065

EXHIBIT "27"



**Exhibit 27
0067**

EXHIBIT "28"



**Exhibit 28
0069**

EXHIBIT "29"

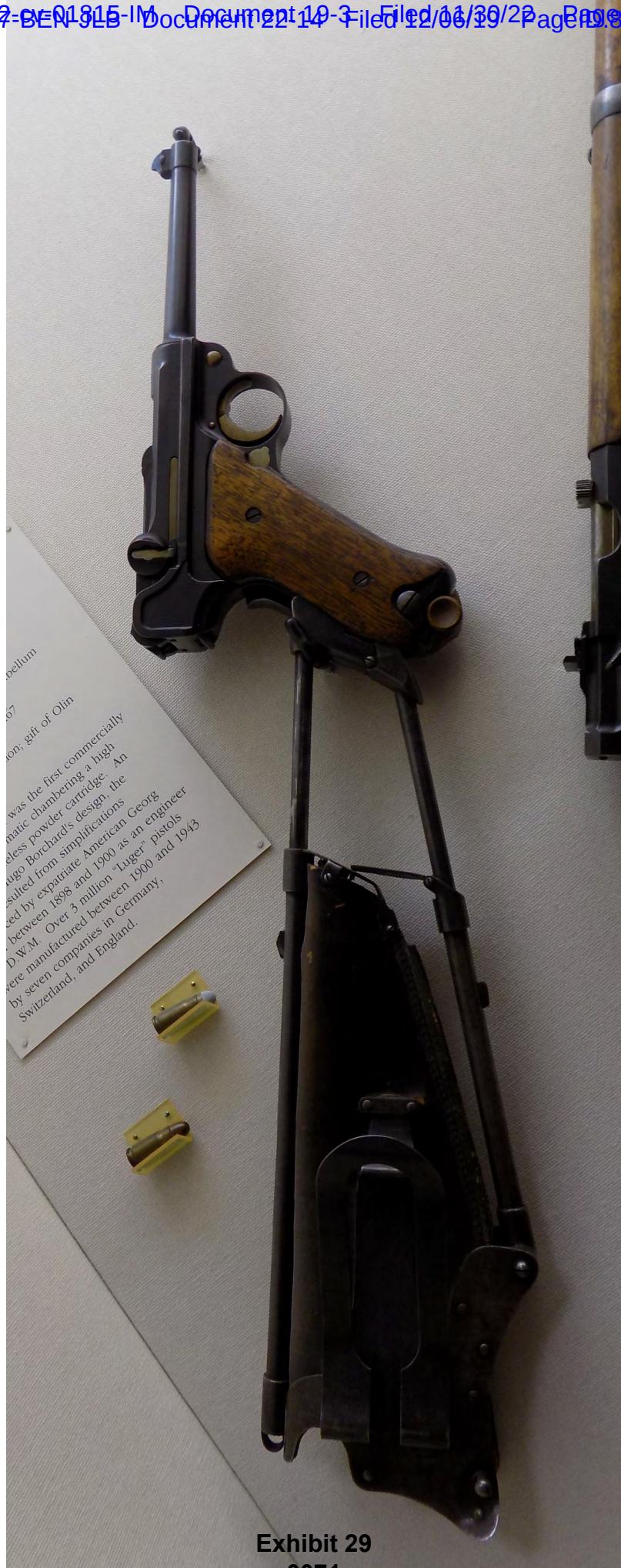


Exhibit 29
0071

EXHIBIT "30"



**Exhibit 30
0073**

EXHIBIT "31"



**Exhibit 31
0075**

EXHIBIT "32"



Exhibit 32
0077

EXHIBIT "33"



Exhibit 33
0079

EXHIBIT "34"



2000.5.18

AMD 12/17/2013



EXHIBIT "35"



**Exhibit 35
0083**